

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

DAVID HARRELL, *individually and on  
behalf of all others similarly situated,*

Plaintiff,

v.

WEBTPA EMPLOYER SERVICES, LLC;  
HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY; ANTHEM  
BLUE CROSS LIFE AND HEALTH  
INSURANCE COMPANY; and  
ELEVANCE HEALTH, INC.,

Defendants.

Civil Action No.: 3:24-cv-01158-L

Consolidated Action

**JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY  
ALL DEADLINES PENDING APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs and Defendants hereby jointly provide notice to the Court that the Parties have mediated and reached an agreement in principle on the material terms of a classwide settlement. The Parties intend to file their comprehensive settlement agreement along with Plaintiffs' Motion for Preliminary Approval within 30 days of today, which is on or before February 28, 2025.

In light of the settlement, the Parties respectfully move the Court for an order continuing the stay ordered by the Court on September 30, 2024 (DE# 59), pending the filing of the Plaintiffs' Motion for Preliminary Approval and thereafter a Motion for Final Approval of the settlement.

Should the settlement agreement not receive final approval by the Court, or the stay otherwise be lifted without a settlement, Defendants respectfully request that Defendants' deadline to answer or otherwise respond to Plaintiffs' Consolidated Complaint would be 60 days after an order reopening the case.

Dated: January 29, 2025.

Respectfully Submitted,

<p><u>/s/ Jeff Ostrow</u> Jeff Ostrow (<i>pro hac vice</i>) <b>KOPELOWITZ OSTROW P.A.</b> 1 W. Las Olas Blvd., Ste. 500 Fort Lauderdale, FL 33301 Telephone: (954) 332-4200 ostrow@kolawyers.com</p> <p>Gary Klinger (<i>pro hac vice</i>) <b>MILBERG COLEMAN BRYSON</b> <b>PHILLIPS GROSSMAN, PLLC</b> 227 W. Monroe Street, Suite 2100 Chicago, IL 60606 Telephone: (866) 252-0878 gklinger@milberg.com</p> <p><i>Interim Co-Lead Counsel</i></p>	<p><u>/s/ Blayne Thompson</u> Blayne Thompson Texas Bar No. 24088525 <b>HOGAN LOVELLS US LLP</b> 609 Main St., Suite 4200 Houston, TX 77002 Tel: (713) 632-1400 Fax: (713) 632-1401 blayne.thompson@hoganlovells.com</p> <p>Allison Holt Ryan (<i>pro hac vice</i>) Abby Walter Gray (<i>pro hac vice</i>) <b>HOGAN LOVELLS US LLP</b> Columbia Square 555 Thirteenth Street, NW Washington, DC 20004 Tel: (202) 637-5600 Fax: (202) 637-5910 allison.holt-ryan@hoganlovells.com abby.waltergray@hoganlovells.com</p> <p>Hans H. Hertell (<i>pro hac vice</i>) <b>HOGAN LOVELLS US LLP</b> 600 Brickell Ave., Suite 2700 Miami, FL 33131 Tel.: (305) 459-6500 Fax: (305) 459-6550 hans.hertell@hoganlovells.com</p> <p><i>Counsel for WebTPA Employer Services, LLC; Hartford Life and Accident Insurance Company; Elevance Health, Inc.; and Anthem Blue Cross Life and Heath Insurance Company</i></p>
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**LOCAL RULE 7.1 CERTIFICATION**

I HEREBY CERTIFY that on January 29, 2025, Parties have agreed to the relief requested herein.

*/s/ Jeff Ostrow*  
Jeff Ostrow

**LOCAL RULE 42.1 CERTIFICATION**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon all counsel of record for each party in the above-captioned action via electronic mail on this 29<sup>th</sup> day of January, 2025.

*/s/ Jeff Ostrow*  
Jeff Ostrow